

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

APRIL ALLAN,

Plaintiff,

ν .

UNITED STATES OF AMERICA,

Defendant.

No. 1:18-cv-821 (LMB/MSN)

DEFENDANT'S WITNESS LIST

Pursuant to this Court's Order of September 26, 2018, *see* Dkt. 6, Defendant, through its undersigned counsel, hereby respectfully submits its list of potential witnesses for the trial in the above captioned matter.

WITNESSES

In accordance with Federal Rule 26(a)(3), the witnesses listed below who are marked with an asterisk are those Defendant expects to present at trial. The additional witnesses designated are those Defendant may call if the need arises. Defendant reserves the right to seek to present the testimony of such witnesses by *de bene esse* deposition or through discovery deposition testimony if the witness in question is, unbeknownst to Defendant at the present time, unavailable for trial.

The witness list below reflects the present status of this litigation. Accordingly, Defendants reserve the right to amend this list—including eliminating proposed witnesses—should further litigative developments (including, *inter alia*, positions advanced by Plaintiff) warrant.

1. Jacqueline Anderson, M.D.
2. David Bianchi, M.D.*
3. Patrick Clyde, M.D.
4. David Cooper, M.D.*
5. Diane Elegino-Steffens, M.D.
6. Ed Furber*
7. Ryan George, M.D.*
8. Kate Kinnaird, M.D.
9. Caroline Kolb, M.D.*
10. Michael Orestes, M.D.*
11. Alicia Sanderson, M.D.
12. Mohamed Shakir, M.D.*
13. Patrick J. Voorhees, M.D.
14. Leonard Wartofsky, M.D.*
15. Bryan Welsh, R.N.
16. Lindsey Salis (Wilson), M.D.
17. Any witness necessary to authenticate records and/or establish the manner in which records were kept.
18. Any other witnesses designated by Plaintiff to whom Defendant does not object.

Defendants may also call other witnesses necessary to respond to any testimony offered by Plaintiff which was not previously disclosed.

DATE: February 21, 2019

Respectfully submitted,

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:

/s/

R. TRENT MCCOTTER

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Litigation Attorney
US Army Legal Services Agency

Debbie Davis
Attorney-Advisor
Office of the Command Judge Advocate
Fort Belvoir Community Hospital

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (“NEF”) to the following:

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Regan Zambri & Long
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_____/s/_____
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